

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
v.)	Case No. 20-cv-423-JFH
)	
JEFFREY LOWE,)	
)	
LAUREN LOWE,)	
)	
GREATER WYNNEWOOD EXOTIC)	
ANIMAL PARK, LLC. And)	
)	
TIGER KING, LLC.)	
)	
Defendants.)	

**REPLY TO RESPONSE TO MOTION TO WITHDRAW AS COUNSEL OF RECORD
FOR DEFENDANTS**

Counsel has moved to withdraw from all cases involving the Defendants. The Plaintiff's complaint that this matter will be "delayed" or cause "prejudice" is misplaced. Counsel has a conflict. The undersigned cannot be any clearer than that and still comply with Rule 1.6. Rule 1.16(a) states counsel "shall withdraw" if a conflict arises. It has. Defendants are well aware of counsel's intention to withdraw. They were aware in March when counsel reasonably believed he could not effectively represent them due to continued health issues, and they are well aware now that a conflict has arisen. They can either get new counsel or not, particularly for the corporate defendants. This action will not go any faster with the undersigned as counsel because he cannot represent them under Rule 1.16.

s/Daniel J. Card

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CERTIFICATE OF SERVICE

The undersigned, Daniel J. Card, certifies that the foregoing was served on July 13, 2021, to the following:

Mary Hollingsworth-via CM/ECF
Brienna Strippoli-via CM/ECF

s/Daniel J. Card
Daniel J. Card